




Commonwealth of Massachusetts
Executive Office of Health and Human Services
Office of Medicaid
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Eligibility Operations Memo 07-09
June 15, 2007

TO: MassHealth Eligibility Operations Staff

FROM: Russ Kulp, Director, MassHealth Operations 

RE: **Verification of Citizenship and Identity**

Introduction

Due to a change in federal law that was effective July 1, 2006, Massachusetts now requires individuals who state that they are U.S. citizens or nationals to provide acceptable documentation of their citizenship and identity when first applying for MassHealth or upon their MassHealth annual redetermination of eligibility. This requirement must be satisfied only once.

MassHealth no longer accepts self-declaration as evidence of citizenship.

The following are the **only** individuals who are **not** required to verify citizenship and identity, as long as they meet the following requirements:

- a child, aged one through 18 years, with family group income greater than 150% of the federal poverty level (FPL) and at or less than 300% of the FPL, who qualifies for the State Children's Health Insurance Program (SCHIP)
 - Family Assistance Premium Assistance; or
 - Family Assistance Purchase of Medical Benefits; or
- a child, under the age of one and not born to a MassHealth-eligible woman, with family group income greater than 200% of the FPL and at or less than 300% of the FPL, who qualifies for the State Children's Health Insurance Program (SCHIP)
 - Family Assistance Premium Assistance; or
 - Family Assistance Purchase of Medical Benefits.

The new federal law does not include any changes for documented immigrants, who must continue to provide proof of their immigration status to MassHealth.

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**Time Frames
for Applicants**

All New Applicants

MassHealth and Commonwealth Care coverage will not begin until all necessary documentation, including proof of citizenship and identity, is submitted within the necessary time frames.

Waiver Population

Waiver applicants will have a 60-day time frame (current VC-1 process) to provide verifications.

Traditional Population

Traditional applicants will have a 30-day time frame (current VC-1 process) to provide verifications. For the traditional long-term-care population, the MassHealth Enrollment Center (MEC)-specific online MassHealth Information Request (MIR) has been updated to request citizenship and identity information. MEC staff must do a SVES type "4" match to see if the individual is verified by receipt of Medicare or has been determined disabled by the federal government (SSDI).

**Time-Limited
Presumptive
Coverage**

Upon application, pregnant women and children under age 19 will receive time-limited presumptive coverage, if otherwise eligible. Failure to submit documentation of citizenship and identity within the 60-day time frame will result in the termination of MassHealth presumptive benefits.

**Automation of
Verifications**

Effective July 17, 2006, MA21 was equipped to electronically match data with the following sources. If an applicant or member is known to these systems, MA21 citizenship and identity requirements are automatically satisfied.

- MassHealth Operations will use State Data Exchange (SDX) and the Department of Transitional Assistance (DTA) will send MassHealth electronic verification of citizenship and identity for current and former DTA beneficiaries who verified citizenship and identity by submitting acceptable documentation as defined under the Deficit Reduction Act of 2006 guidelines.
 - Individuals receiving or entitled to Medicare Parts A and B are considered to have verified citizenship and identity.
 - Individuals who have been determined disabled by the Social Security Administration (SSA), and are receiving Social Security Disability Insurance (SSDI), but who are not receiving Medicare are considered to have verified citizenship and identity.
 - SSI recipients or children in foster care who receive Title IV-E benefits are considered to have verified citizenship and identity.
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Automation of Verifications
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For children born in a MassHealth-participating hospital to a MassHealth-eligible woman, the Notification of Birth (NOB-1) will be acceptable proof of citizenship and identity.

What Must Be Submitted

Applicants and members must submit the following to verify citizenship and identity:

- one document from the Primary Documents list (since these documents prove both citizenship and identity, no other documentation is required); or
- one document from the Secondary Documents list (citizenship only), or one document from the Third Level Documents list (citizenship only), or one document from the Fourth Level Documents list (citizenship only), plus one document from the Proof of Identity list.

The acceptable verifications are listed at 130 CMR 504.002 and 518.002.

Current Members in MA21

MassHealth requires an annual redetermination of eligibility. When an annual redetermination is due, current members will be notified (through the current VC-1 process) that they are required to provide documentation of citizenship and identity.

- waiver population members have a 60-day time frame (current VC-1 process) to provide verifications.
- traditional population members have a 30-day time frame (current VC-1 process) to provide verifications.

The cover letter to the MassHealth Eligibility Review (ERV) has been updated to request citizenship and identity verification from individuals who self-declared citizenship in the past. In addition, language has been added to the VC-1 requesting verification of citizenship and identity. If a member does not provide satisfactory evidence of citizenship and identity, MassHealth benefits will be terminated.

Reasonable Opportunity Extensions

Time frames for verification of citizenship and identity may be extended if the applicant or member indicates to MassHealth that he or she is making a good-faith effort to submit the documentation and requests additional time.

If the applicant or member has submitted **all** requested verifications, except citizenship and/or identity:

- waiver population applicants and members may request an additional 60 days to submit citizenship and identity verification; and
 - traditional population applicants and members may request an additional 30 days to submit citizenship and identity verification.
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**Assistance from
MassHealth**

MassHealth may help applicants and members get appropriate citizenship and/or identity verifications.

- Affidavit of Parent or Guardian on Identity of Child under Age 16 (C+I-Aff (02/07)): This MassHealth form allows a parent or guardian of a child under age 16 to attest to the identity of their children under age 16 when they are unable to provide other acceptable identity verification. The Medical Benefit Request (MBR) and the ERV forms were updated in April 2007 to include a section on the signature page about identity. By signing the application, the parent certifies the identity of his or her children who are included in the application.
- Request for Verification of Massachusetts Birth Record (C+I-AVR (Rev. 02/15/07)): This MassHealth form allows an applicant or member to request a Massachusetts record of birth (free of charge) from the Department of Public Health Registry of Vital Records and Statistics.
- Obtaining birth records from other states: MassHealth may provide an applicant or member with contact information for vital records requests for the other states and the territories. For more information, visit www.cdc.gov/nchs/howto/w2w/w2welcom.htm.
- Other assistance: MassHealth may provide an applicant or member with a directory of community-health or human-services resources that can help in gathering acceptable documentation required to verify citizenship and identity.
- Individuals needing additional assistance can call MassHealth Customer Service at 1-800-242-1340.

**Failure to Provide
Verifications**

Individuals who are denied eligibility for failure to provide verification of citizenship or identity, **plus** other verifications (income, signature, or third party recovery), will not be eligible for MassHealth or Commonwealth Care.

Questions

If you have any questions about this memo, please have your MEC designee contact the Policy Hotline.
